Sl. No. B. 53

Pt - I

1949.

File No. 1932/36

P.W. DEPARTMENT

A CLASS E BRANCH (I)

Subject:— The Association of Electric undertakings Electricity

(Bombay (Special Powers)

(Amendment) Bill 1945

A(K) 1949

File No. 1932/36-E- I

Sta. Sectt. Slip 24-A

2004—5,00,000—9-52—K2*
G.R., G D., No. 2408, dated 22-6-22.]

Std. Sectt. 78 e.

Correspondence

DOCKET SHEET

Subject :—

File No. 193.2/36 — I

P. W. DEPT.

E BRANCH. I

References :—

Date.	To whom sent.	Notes and instructions.

THE ASSOCIATION OF ELECTRICAL UNDERTAKINGS,
BOMBAY PROVINCE.

Killick Building,
Home Street, Fort,
Bombay.
24th September, 1949.

No. AEU/6/474/50.

U R G E N T .

The Secretary to the Government of Bombay,
Public Works Department,
Bombay Castle,
BOMBAY.

Dear Sir,

Electricity Control.

The Bombay Electricity (Emergency Powers) (Amendement) Ordinance, 1949, enacted with effect from the 1st of September, 1949, introduces certain new provisions in what may now be called the Bombay Electricity(Special Powers) Act, 1946, (hereafter referred to as the 'original Act'). On these, the Association desires to comment as follows:

2. Clause 6(2) of the Ordinance: The addition made to sub-clause 2 of clause 5 of the original Act stipulates that within 15 days from the date of receipt of requisition by a Liconsee, he must make an applicatio n to Government in that behalf. This will obviously involve a great volume of dispersed work on Licensees and it is thought that the objects would better be m t if consolidated statements can be submitted by Licensees, to Governmantat not less than monthly intervals on the basis of the consolidated forms prescribed rescribed recently in a similar context (vide P.W.D. letter No 1932/36-E 1 (c) dated 21st April, 1949, from the Under - Secretary to the Ahmedabad Electricity Co. Ltd.,).

3. Clause 7 of the Ordinance: The new clause 6 A departs from the tenor of the orginal Act in that the orginal Act, vide clauses 3.4 and 5 are not aimed at the Purposes for which supply of electricity may be used, but at the.....

the quesdtm which may be used or alternatively at supply being taken at all. Only in Clause 6 of the original Act was there anything about purposes of use and that was limited to advertisement lighting on the exterior of any permises where the fact of use for such purpose could clemely be observed. Now sub-clause (b) of Clause 6 A also does not aim at the purpose for which supply is used it is aimed at the time during which su ply can be used, and is further aimed at the consumer, but subclause (a) of Clause 6 A (and here is the cirtical departure)is aimed at any purposes, which may be specified, for which supply may be used by a consumer, whereas the onus of ersuring compliance is placed upon the Licensee.

4. It is desired to emphasise most strongly that it is generally impracticable for the Licensees to know with certainty for exactly wha purposes his supply is being used in a consumer's permises. It is therefore not just to throw upon the Licensee the onus of ensuring compliance by consumers. For instance, if Government were to order that the power supplied by a Licensee should not be used for, any domestic heating, but a consumer does so use it, the penalty will be on the supplier who has no means of knowing, where as there seems to be on penalty on the consumer who is defeating the object of the provision Further there seems nothi in the Act to prevent the consumer from sucing the Licensee if the latter does try to prevent the former from using of the power for a purpose for which he would normally be entitled to use it.

5. Clause 6 B of the Ordinance introduces new penalties for failure to comply with the provisions of Clause 6 A over and above the penalties already prescribed by Clause

8 of the original Act for breaches thereof.

So far as the consumer is concerned the new penalty is not much more severe then it is already competent on Government to affect under Clause 3 of the orginal Act, but in respect of the Licensee who (as has been pointed out above) may be quite unaware of the breach, the new penalty prescribed, in addition to the penalty under Clause 8, is extremely heavy. Indeed it is so heavy, involving as it may be the dispossession of the Licensee's whole business, that is seems entirely disproportionate, particularly in a law the "Statement" to which makes it clear was designed premarily for the protection of the Licensee against obligations under the Electricity Act, 1910, which present circumstances have rendered him unable to perform for reason beyond his control.

6. It is consequently felt that in regard to Clause 6 A sub-clause (a) should more justly read:-

> (a) for prohibiting or regulating subject to such conditions as it may specify in the order, the use of electrical energy by any consumer or class of consumers for any purposes specified in such order;

This amendment would, it is felt, arm Government with the necessary powers for which it appears to be seeking (vide Clause 3 of the "Statement" attached to the Ordinance) and throw the onus for observance and the penalty for breach squarely where they belong, namely upon the consumer.

If this is accepted, then there is no necessity for any further penalty such as appears in Clause 6B(a)

7. In the opinion of the Association, Clause 6 C providing powers for discontinuance of energy to consumers for failure to pay fees to Electrical Inspectors or their Assistants seems to be out of place in an emergency legislation. Although the Ordinance substitutes the word "emergency" by the word "special" in the original Act, it nevertheless seems that, as an Ordinance, it must be intended to meet an emergency situation, and that the power sought for in regard to penalties for failure to pay fees should properly be enacted separately. In any event it is submitted that any period of grace for payment of fees must surely run from date of receipt of a bill and not from the date of the inspection as laid down.

8. This Associatio sincerely hopes that Government will earnestly consider the submissions made above before the Ordinance is submitted to the Legislature for re-enactment on a permanent basis. It is also hoped that during such time as the Ordinance is in force before re-enactment by the Legislature, no orders will be issued by Government under Clause 6 A, which could result in Licensees being dragged into litigation with any of their consumers (as indicated above), or hich could involve Licensees in severe a penalty as dispossession of their property arising from actions of consumers beyond the Licensees' knowledge or control.

9. May the Association once again suggest that, when Government has the intention of amending legislation, makin g orders, or giving directions vitally affecting the interests of Licensees in the province, this association may be consulted before effect is given thereto, so that the view point of the Industry may be appreciated in good time?

Yours faithfully,

Id/-
Secretary.

Copy to all Members.

The Association of Electrical Undertakings

Bombay Province.

Killick Building
Home St.

Bombay, 5th October 1949.

Ref No. ———

HON'BLE DOCTOR JIVRAJ MEHATA

MINISTER PUBLIC WORKS
COUNCIL HOUSE
POONA

UNDERSTAND BILL AMENDING BOMBAY ELECTRICITY (EMERGENCY) POWERS ACT 1946 BEING PLACED BEFORE ASSEMBLY TODAY FOR CONSIDERATIO STOP ALTHOUGH BILL REPORTED TO HAVE BEEN PUBLISHED IN GAZETTE OF 29th SEPTEMBER HAVE BEEN UNABLE TO GET A COPY INSPITE OF BEING SUBSCRIBERS AND SPECIALLY CONTACTING GOVERNMENT PRINTING PRESS AND SEC ETARIAT STOP AS COPY OF GAZETTE USUALLY RECEIVED AFTER TIMELAG FEAR ASSOCIATION WILL HAVE NO CHANCE OF COMMENTING ON BILL BEFORE IT IS PASSED CONSEQUENTLY HOPE GOVERNMENT ILL HAVE GIVEN DUE CONSIDERATION TO ASSOCIATIONS REPRESENTATION ON BOMBAY ELECTRICITY (EMERGENCY POWERS) (AMENDMENT) ORDINANCE BEFORE FINALISING BILL SO- PLACED BEFORE LEGISLATURE STOP COPY OF LETTER DATED 24TH SEPTEMBER RECORDING VIEWS ON ORDINANCE SENT BY EXPRESS DELOVERY FOR READY REFERENCE

For the Association of Electrical
Under-takings, Bombay Province

Id/-
Secretary.

Confirmation copy by post:

To-gether with copy of Association's letter No. AEU/6/474/50 of 26th September, 1949, on the Bombay Electricity (Emergency Powers) (Amendment) Ordinance, 1949.

Yours faithfully,

V.V.V./-

Legal Department.

Two points are raised in the memorial of the Association of Electrical Undertakings.

The first point is that the period of 15 days which is provided in new section 5(2) is too short, and that it should be altered to one month. But the section itself gives power to Government to extend that period, as the section contains the words "within 15 days or within such longer period as the Provincial Government may allow". The period of 15 days was inserted at the suggestion of the P.W.D. Electricity Department.

The second point urged is that the new sections 6 A and 6 B which are inserted by clause 7 makes the incencee liable, and no liability is imposed on the consumer. This view is incorrect. If the consumer diverts the use of the energy under section 46 of the Indian Electricity Act, 1910, which is the main Act, the consumer is liable and is punishable in a Cirminal Court with fine which may extend to Rs. 200.

For the above reasons, it is not necessary to make any changes in the Bill which is before the House.

Id/-
Additional Secretary to Government

H.M.(P.W.D.)

W.W.W./-

No. 1932/36-B (II)

Public Works Department,
Council Hall, Poona,
8thOctober 1949.

To

The Secretary,
The Association of Electrical Undertakings,
Bombay Province, Killick Building, Home Street,
BOMBAY.

Dear Sir,

I am desired by the Honorable Minister for Public Works to acknowledge receipt of your wire of the 5th instant and copy of your letter of 24th September addressed to the Secretary to the Government of Bombay, P.W.D., and to say that various points urged by you in your said representation have been taken into consideration. In view of the urgency of the situation, it was not possible to delay the consideration of Bill to amend the Bombay Electricity (Emergency Powers) Act, 1946, by the Legislature as a permanent measure on the subject matter of the Bill had to be placed on the Statute Book before the Legislature adjourns beforethe Diwali Holidays. As You may know, an Ordinance issued by the Provincial Government ceases to be effective on the expiry of six weeks after the date on which the Legislature meets and hence the urgency of the action.

Regarding your complaint that a copy of the Bill not being available to you published in the Government of Bombay Gazette on 29th September 1949, and thus the difficulty experienced by your Association and others not being in a position to know of its various provisions and commenting or representing their views thereon, it may be said that the provisions of the Bill are identical in all essential respects, with the provisions of the Bombay Electricity (Emergency Powers) (Amendment) Ordinance

of 1949. Members of your Association as also of the public would therefore know as to the nature of the various provisions of the Bill under reference. Moreover, your letter of 24th September 1949 referred to above has brought to the notice of Government, your Association's views on the various provisions in the said Ordinance and consequently in the said amending Bill. Referring to the points urged therein, I am to say as under:-

Clause 6(2) - Government have appreciated the difficulties urged in your representation in this regard and have, therefore amended the Bill by substituting '0 no month' for '15 days' from the date of receipt of a requisition by a licensee within which the latter should submit the requisition to Government.

Clause 7. - As regards your complaint that no liability is imposed on the consumer while a licensee is made liable for misuse by the former, I am to draw your attention to Sections 46&'44 (b) of the Indian Electricity Act, 1910, which is the main Act, wherein it is provided that a consumer is liable and is punishable in a ciriminal court for offences in this regard referred to in your letter under reply. In view of the difficulty of supplying electric energy to the extent of the demand made therein which difficulty is likely to last for a number of years, it is also essential that Government should have full powers for the proper control over t the distribution and use of electric energy.

Regarding your comments in the last but two paragraphs of your letter under reply, your association will realise the necessity of payment in due time .....

due time by parties concerned for services rendered by Government Inspectors in the way of inspecting and testing periodically medium pressure of high pressure electric installations, including appliances used in the generation, transmission, supply or use of energy. It is because of failure on the part of various parties to settle their dues within thetimme allowed in law, tha Government were compelled to incorporate a clause to fill up a lacuna in the previous legislature. As an amending Bill was before the Legislature, the present was the proper time to do so.

It would thus be seen that Government gave due consideration to the points urged in your said representation, dated 24th September 1949; and have done the needful to meet the situation arising out of the acute shortage in electric power. If you however desire to meet the Hon'ble Minister, he would be glad to do so on Tuesday, the 11th instant at 12-30 p.m. in his office.

Yours faithfully,

Id/-

for Secretary to Government of Bombay,
Public Works Department.

Id/- 8-10-49

W.W.W./-

D.O. No. 1932/36-El (II).

Public Works Department,
Concil Hall,
Poona,
13th October 1949.

Dear Sir,

When the representatives of your Association interviewed the Hon'ble Dr. Jivraj N. Mehta, Minister for Public Works, on Tuesday, the 11th instant in regard to the Bombay Electricity (Emergency Powers) (Amendment) Bill, 1949, they expressed their anxiety with regard to the Powers goven to Government under Clause 6(B) of revolking the licenso. The Hon'ble Minister has given due consideration to the arguments urged against the incorporation of such a clause in the Bill and has come to the conclusion that occasions may arise when in the interest of the shoreholders as well as the consumers the exercise of such a power may become inperative. Ordinarily such powers should never be used but it is not impossible to forsee events when it may become necessary. For example, your Association must be aware of the circumstances under which Government were compelled under the Defence of India Rules to revoke the license of the Electric Supply concern at Hubli (Dist. Dharwar) and to take possession of the PowereHouse of the Company.

As your Association may well know it was from the year 1943 that serious and innumerable complanits started coming in from the Public of Hubli town about the very unsatisfactory supply of electricity by the Hubli Electtic Supply Co, The supply was very irregular with even frequent failures. Although the Co.had six generating sets with an installed capacity of about 550 kws. only, because the sets were not at all being properly maintained by replacing the worn out parts etc. Besides the Co. used to emplgy only Apprentice Engineers instead of well qualified hands to

run the machiner The Electrical Inspector, Bombay Province, Repeatedly asked, under the provisions and the Eoectricity Act, the management to take effective steps to set right the supply; but to no avail. A notice of six month (although Govt. could have revoked the license immediately under the terms of the license) was therefore served upon the Co with a view to give them sufficient time to set right the defects.

Although the Co. tried to show on paper that they were taking the necessary stops nothing was actually done. When therefore the period of notice expired Govt. had to revoke the license. According to the terms of the Municipality. The Administrator of the Municipality (which was under suspension at that time) however expressed his inability to take it over. When the Managing Director (Mr. Amte) of the Co. refused to hand over the concern to Govt. according to the orders action was taken under the DEfence of India Rules to take possession of the Power House etc.

In the circumstance your Association will appreciate the need of Government retaining the power in the interest of shareholders as well as consumers and the public at large. If your Association has still any representation to submit in this connection the Hob'ble Minister will be glad to consider the same.

Yours faithfully,

Id 13-10-49.
For Secretary to Government
of Bombay,
Public Works Department.

The Association of Electrical Undertakings

Bombay Province

Killick Building

Home Street.

Bombay: 13th October 1949:

Ref No. A.E.V./6/534/50

The Hon'ble Dr. Jivraj Mehta,
Minister for Public Works,
Government of Bombay,
Council House,
POONA.

Dear Sir,

The Bombay Electricity (Special Powers)
(Amendment) Bill, 1949.

.....

I am sorry that when you first telephoned to me I was out and it was indeed kind of you to have rung me up later communicating to me Government's reasons for retaining the provision regarding the cancellation of the license in the Bill.

After informal discussions with my colleagues I confirm having telegraphed to you this morning as follows:

"REFERENCE YOUR TELEPHONE COMMUNICATION THIS MORNING FOR WHICH AM MUCH OBLIGED HAVE DISCUSSED MATTER INFORMALLY AND FIRST REACTION IS THAT THE BOARD UNDER CENTRAL ELECTRICITY SUPPLY ACT COULD DIRECT UNDERTAKINGS FULFIL OBLIGATIONS CONSEQUENTLY SITUATION SUCH AS AROSE HERE NOT POSSIBLE REPETITION STOP IN ANY CASE WE UNDERSTAND THAT AMENDMENTS TO SECTION FOUR AND FIVE OF 1910 ACT

DEALING WITH REVOCATION PROVISIONS ARE BEING DRAFTED AND BELIEVE WERE BEING CONSIDERED RECENTLY BY CENTRE STOP GRATE UL FOR AFFORDING OPPORTUNITY PLACE VIEWS BEFORE YOU AND LOOK FORWARD TO YOUR LETTER MEANWHILE HOPE STIOL POSSIBLE RECONSTDER PROVISION FOR REVOCATION OF LICENSE IN SPECIAL POWERS BILL IN LARGER INTERESTS OF GENERAL INVESTMENT IN ELECTRICAL INDUSTRY."

I look forward t o receiving your letter with interest.

Yours faithfully,

Id/-

PRESIDENT.

W.W.W./-

AIDE-MEMOIR.

The Association of Electrical Undertakings, Bombay Province.

Interview with Hon'ble Dr. Jivraj Mehta, Minister for Public Works, Government of Bombay

On Tuesday, 11th October, 1949.

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1. Dissappointment at failure of Government to consult Association in important matters or even keep them informed of developments.

2. May Departments concerned please be instructed to ensure that the Association gets advance copies of Gazette notifications as affecting the Industry.

3
3. Bombay Electricity (Emergency Powers)(Amendment) Ordinance And Bill.
Association's letter of 24th September and Government's reply.
Penal Provisions of Sections 6 A and 6 B strike at confidence of Investors.

W.W.W./-

Aide-Memoire.

The Association of Electrical Undertakings,
Bombay Province.

Association grateful to the Hon'ble Minister for affording an opportunity to place before him personally the Industry's views on the Bombay Electricity (Special Powers) (Amendment) Bill, 1949.

The Association's telegrams dated 5th and 6th October to the Hon'ble Minister were the result of information from the Secretariat in Bombay that its representation on the Bombay Electricity (Emergency Powers) (Amendment) Ordinance, 1949, had remained unattended to.

While the Association is thankful to Government for their letter of 8th October indicating the action taken by them to test the Industry's views, the Association is of the opinion that this does not meet the situation adequately.

The penalties against a Licensee provided under the new Clause 6B are drastic and should have no place in a legislation of this type. Other penalties are already there under Clause8. The added provision for cancelling a License will have a deterrant effect on an already nervous money market and increase the difficulties to raise development capital.

The penalties under Sections 44 and 46 of the Indian Electricity act, 1910 (mentioned in Governments letter of 8th October, 1949) appear inapplicable, and, in any case, are relatively

small. Heregain see the penalities under Clause 8, but note that in any event the consumer is not bound by Clause 6A(1) (a).

In Clause 6 (c) surely no penalty should properly accrue tillafter a proper bill has been submitted and not been paid.

On further consideration the following points arise.

Clause6(2): While the Association is pleased to note that the period of 15 days within which Licensees are obliged to submit applications to Government is proposed to be extended to one month, would state that even this period will be inadequate if the signature of the consumer is insisted upon on the special application form as is now the practice. The consumer has to sign his requisition on the Licensee originally and need not therefore sign the special form to be submitted by the Licensee to Government. He may delay unduly, or mislay the papers. It is therefore, necessary that consumers' signature not on the special form/be required in administering this Clause.

Clause6A(1), empowers Government to cancel sanctions for loads already granted. This would result in hardship as on the basis of such sanction heavy investment expenditure is

undertaken ....

undertaken by consumers in purchase of machinery, etc., and if their loads once sanctioned are likely to be suspended (as has once been done by Government) (vide their letter to Licensees No. 1932/36-El(c) of 20th June, 1949) they will be put to great loss.

The Association would, therefore urge that the suggestions contained in its letter of 24th September, and the points mentioned above, be favourably considered and the Bill suitably amended in the Upper House if it has passed all the stages in the Lower House.

Association would also like to take this opportunity to stress that it be consulted in such matters (it has already been recognised by Government as the spokesman of the Industry, vide letter from the Public Works Department No. S.37/6/4359-M of 9th April, 1941) as that would enable Government to know the Industry's point of view in good time.

May be we also suggest that to avoid such developments in future, as has happened in the case of this Bill, suitable consultative machinery be evolved. We suggest that the Secretary of the P.W.D. and other Officers of Government meet the Secretariat of the Association at periodical intervals, say once a month, to discuss outstanding questions. This would be of great assistance in the disposal of such issues as they arise from time to time.

11th October, 1949

W.W.W./-

SUPPLEMENTARY AIDE - MEMOIRE

THE ASSOCIATION OF ELECTRICAL UNDERTAKINGS,

BOMBAY PROVINCE.

. . . . . .

1. The Bombay (Sur Costs) Surcharge Act, 1946, expired on 30th September, and in spite of the Association's request no action was taken by Government to re-enact the provisions of the Act. The Association was not even notified in writing Government's decision on the matter although verbally it was given to understand that it was Govern,ent's intention to let the Act expire. Consequently Licensees had to resort to their rights under the Electricity (Supply) Act, 1948, and increase the rates to the extend necessary to offset the surcharge and rising costs. Reactions against these rate increases in mofussil town have been adverse and would Government be very kind ento issue a Press Note explaining that the increase in rates effected by Licensees have been ~~adverse and would Government be ver~~ found necessary to offset the surcharge up till now in force and in accordance with the Electricity (Supply) Act, 1948 which ensures Licensees a reasonable return. Such an announcement by Government would have a stabilising effect.

2. Certain Licensees have sent representations to Government requesting sanction for departure from the prescribed period of lives in respect of certain plant as permissible under the Proviso to Clause XVII (8) of the Sixth Schedule ade to the Electricity (Supply) Act, 1948. Early action on these would be greatey appreciated, as otherwise further increase in tariffs will result thus raising living costs.

3. Information on the progress of the formation of the Provincial Electricity Board under the Electricity (Supply) Act would be much appreciated.

Bombay, 11th October, 1949.

W.W.W./-

Association of Electrical Undertakings
Bombay Province.

Killick Building
Home Street.

Bombay 15th October, 1949.

Ref. No. A.E.V./6/538/50

The Secretary to the Government of Bombay,
Public Works Department,
Council House,
Poona.

Dear Sir,

The Bombay Electricity (Special Powers) (Amendment) Bill, 1949.

?.....

I thank you for your letter No. D.O.No. 1932/36-E 1(II)of 13th October which has crossed the President's letter No. A.E.U./6/534/50 of 13th to the Hon'ble Minister for Public Works.

If the reason for retaining the power to Government under Clause6(B) for revoking the license is to avoid a repetition of the situation as arose in the case of the Hubli Electricity Co., the Association would submit that there are enough powers for Government in existing law to take care of such contingencies. These can be summed up as follows:

(a) If you will refer to Section 55of the Electricity (Supply) Act, 1948, it will be seen that every Licensee is under obligation to "comply with such directions as the Board may from time to time give him for the purpose of achieving the maximum of economy and efficiency in the operation of the station." Disregard of the obligation under this section is punishable under Section 77 of the Electricity .....

(Supply) Act, 1948. This very much strengthens Governments hands.

(b) Section 4 of the Indian Electricity Act, 1910, provides ample powers to the Provincial Governments to revoke a License where a Licensee where a Licensee makes "wilful" and unreasonably prolonged default in doing any-thing required of him under the Act. This Section read with Clause IV and VI of the schedule to the Indian Electricity Act, 1910, fixes definitely the obligations of a Licensee to meet any requisition (subject to the extent excepted under Clause VI) and it was against the provisions of this Act That it has been necessary to enact the control measures for the protection of the Licensees.

(c) As already stated in our telegram of 19th October to the Hon'ble Minister, the information at the disposal of the Association indicates that the Central Government are already considered stiffening the provisions of Section 4 and 5 of the Indian Electricity Act, 1910.

While appreciating Government's desire to arm themselves with such stringent powers as revocation of License to meet an emergent situation, the Association is of the view that the resources under existing law now available to Government are adequate to prevent such a situatio like the Hubli incident developing and consequently the revocation provision under Clause 6(B) of the Bombay Electricity (Special Powers) (Amendment) Bill, 1949, is unnecessary, and at worst, can only scare the investor - a development it is hoped it is not Government'

it is hoped it is not Government's intention to precipitate

The Association would, therefore, once again urge Government to re-consider their stand and drop the revocation provision in the Bill.

Yours faithfully ,

Id/-
Secretary.

W.W.W./-

1932/36/68959.

El. B.E.(I)

P.W.D.

Submitted with refec. to D.O. No. 1932/36-EL.(II) dated the 13-10-49.

2. The Association of Electrical Undertakings, Bombay Province, has since advanced further argements why it considers unnecessary the revocation provi sion under Clause 6 (B) of the Bombay Ely. (Special Powers) (Amendment) Bill, 1949. The above Bill has, however, since received the assent of the Governor General and has become an Act. since the 27-10-49. It is, therefore, not possible now to reconsider Govt. stand and drop the revocation provision, as requested by the Assocn., unless the Act is amended for which the Legislature will have to be approched. The El. Engr. to Govt. may be requested to offer his remarks on the Association's arguments before a suitable reply is given to the party.

Thro. El. BE (II)
1.11.49.

Id/- 31-10-49

Id/- 31-10-49

1932/36/68959,

Very urgent u.o. to the E.I. Engr. To Govt. dated 3rd Nov 1949.

W.W.W./-

Below U.O.R. No. 1932/36/68959 dated the 3rd November 1949, from Government in the Public Works Department.

No. (R.M. 31/5887) of 1949
Bombay, 4th November 1949.

Returned, with compliments, with the following remarks on the points raised in the Association's letter:-

(1) Section 6 (A) If the Bombay Electricity (Emergency Powers) Act isnot concerned with econom and efficiency in the operation of the satation, but is puraly concerned in cases of emergency which requires the distribution, su pply, consumption or use of electical energy to be controlled in national interest. Sections 55 and 77 of the Electricity (Supply) Act, 1948, will not, therefore, be of use in this case. Incidantally, it may be pointed out that section 55 of the Electricity (Supply)Act, 1948, has not yet come into force in this province.

(2) The application of section 4 of the Indian Electricity Act, 1910, in the case of revocation of the license granted to the Hubli Electricity Co., Ltd., has led to many legal difficulties and the proceedings in this case have lasted for several year s. Such procedure cannot possibly be permitted in cases where national interests are concerned and spedific provision has, therefore, to be made for breach of ~~section~~ section 6 (A) of the Bombay Electricity (Emergency Powers) Act, which, as stated before, is purely for safeguarding the national interests.

Id/-
Electrical Engineer to Govt.

El. Rr.I 4-11

New Delhi.
October 17,1949.

My dear Jivarajbhi

I am sending herwith the entire correspondence I have received from the Federation of Electricity Undertakings of India and a copy of the reply I have given. We have already discussed this matter and there is nothing much to be done but it would be better if you just send your comments and returned.
~~written~~ the correspondence enclosed.

Yours sincerely,

(N.V. Gadgil).

Hon'ble Dr. Jivraj Mehta,
Minister for P.W.D.,
Government of Bombay,
Secretariat,
BOMBAY.

For very early remarks.

Id/- 22-10-49.

Secy. Id/- 25-10-49.

W.W.W./-

1932/36/728 & 69999 .

El. BE.(I).

P.W.D.

Please see ——————

(a) D.O. letter to the Association on pp. ante.

(b) Associations letter on pp. 31-33 ante.

(c) The Electrical Engr's. note on p. ante.

2. The Association may be replied to as per draft put up, if appel. p. 63

A draft d.d. letter to hon'ble Mr. Gadgil has been put up, which may issue, if appel.

Id/- 9-11-49. Id 10-11-49 Id/- 15-11-49

W.W.W./-

No. 1932/36El (I). P.W.D. Deptt.

B.C., 16th Nov. 1949.

To,

The Secretary,
The Association of Elecl. Undertakings,
Bombay Province,
Killick Building, Home Street,
BOMBAY.

Subject:- The Bombay Ely. (Emergency Powers) Act.

Dear Sir,

With ref. to your letter No. AEU/6/538/50, dt. the 15-10-49, on the above subject, I am directed to state that Section 6 (A) of the Bombay Ely. (Emergency Powers) Act does not relate to problems of economyand efficiency in the operation of a station, but is solely concerned with the control, under emergency conditions, of the distribution, supply, consumption or use of electrical energy. Sections 55 and 77 of the Ely. (Supply) Act, 1948, are not expected to be of avail in such cases. moreover Section 55 of the Ely. (Supply) Act, 1948, has not yet come into force in this Province.

I am further to obse rve that the application of Section 4 of the I.E.Act, 1910, in the case of revocation of the license, granted to the Hubli Ely. Coy., Ltd., has led to legal difficulties and the proceedings in the case have lasted several years. The procedure under Sec. 4 of the I.E.Act cannot usefully be employed in cases of emergency or where national interests are concerned and requisite specific provision for revocation of a license has, accordingly, been made in Sec. 6 (B) for breach of an order under Sec. 6 (A) of the Bombay Ely. (Emergency Powers) Act.

Yours faithfully,
Id/- 10-11-49.

Dy A. -Nil.

Copy forwarded for information to the El. Engr.

to Govt. with ref. to his No. LRM-31-5887, dt.

the 4-11-49.

Id/- 101149.

W.W.W./-

D.O.No. 1932/36-El (I).

P.W.D. Sectt.,
Bombay, 16th Nov. 1949.

My Dear Kakashab,

Please refer to your D.O.letter dt. the 17-10-49, enclosing correspondence from the Federation of Electric Undertakings (which I return herewith). The matter has been fully explained in this G. L. No. 1932/36El.(II), dt. the 13-10-49, addressed to the Association of Electrical Undertakings, Bombay Province, copy of which has since been forwarded to you by the Association. Since then the Association has made a further representation to this Govt. under its letter No.AUE/6/538/50, dt. the 15-10-49 (copy enclosed) and I enclose a copy of the reply given to the Association under this Govt. Letter No. 1932/36-El(I) dt. the 16th Nov. 1949. It will be observed that the revocation Sec. in the Bombay Ely. (Emergency Powers) Act is intended to penalise breches of a Govt. during at emergency and is no case, in our opinion, for its omission. This being the case there is no fear ofscaring the investor to which point the associatio n of Electrical undertakings hasdrawn pointed attention.

I regret there has been delay in writing to you in the matter. The correspondence a companying your letter under reply is returned herewith.

Yours.
Id/-

To
Honourable N.V.Gadgil
Minister for Works, Mines & Powers,
Govt. of India,
New Delhi.

Id/- 10-11-1949.

W.W.W./-

THE AHMEDABAD ELECTRICITY COMPANY, LIMITED.

KELLICK INDUSTRIES LTD.,

CENTRAL ADMINISTRATION DEPT.
Electricity House.
Santa Cruz (East)
P.B. No. 6802
BOMBAY. 25.

Reference no. a/25/4133

30th September, 1949.

The Under Secretary to the Govt. of Bombay,
Public Works Department,
Bombay Castle,
BOMBAY.

Dear Sir,

Ordinance to amend the Bombay Electricity (Emergency Powers) Act, 1946 - (Ordinance No. V. of 1949.)

With reference to the above Ordinance, we would draw your attention to the letter a dressed by the Secretary, The Association of Electrical Undertakings, bombay Province to the Secretary to the Govt. of Bombay, P.W.D., Ref A.U.E /6/474/50 dated 24th September, 49. We would refer in particular to the penultimate paragraph reque ting that no orders be issued by Government under Clause 6A, which could result in Licensees being dragged into litigation with any of their consumers, or which could involve Licensees in so severe a penalty as dispossession of their property arising from actions of consumers beyond the Licensees' knowledge or control.

In connection with Clause 6(2) of the Ordinance, we would like to know how we stand in view of P.W.D. letter No. 1932/36-El(c) dated 21st April, 1949. (vide para 2 of A.E.U. letter.)

Yours faithfully,
The Ahmedabad Electricity Company Ltd.,
CENTRAL ADMINISTRATION DEPARTMENT.

Id/-

W.W.W./-

BOMBAY SUBURBAN ELECTRIC SUPPLY, LIMITED.

KILLICK INDUSTRIES LTD.,

CENTRAL ADMINISTRATION DEPT.,
Electricity House.
santa cruz (east)
P.B. No. 6802.
BOMBAY 25.

Reference No. BSE/25/1175. 30th September, 1949.

The Under Secretary to the Govt. of Bombay,
Public Works Department,
Bombay Castle,
BOMBAY.

Dear Sir,

Ordinance to amend the Bombay Electricity (Emeregency Powers) Act, 1946 - (Ordinance No. V. of 1949).

With reference to your letter No. 1932/36-El(II) dated 20th September addressed to this Company's Office at Bandra, we would draw your attention to the letter addressed by the Secretary, the Association of Electrical Undertakings, Bombay Province to the Secretary to the Govt. of Bombay, P.W.D., Ref. No. AE U/6/474/50 dated 24th idem. We wish to draw particular attention to the penultimate paragraph requesting that no orders be issued by Government under Clause 6A, which could result in Licensees being dragged into litigation with anyof their consumers, or which could involve Licensees in so severe a panalty as dispossessio n of their property arising frm actions of consumers beyond the Licensees' knowledge or control.

Yours faithfully,
Bombay Suburban Electric Supply Ltd.,
CENTRAL ADMINISTRATION DEPARTMENT.
Id/-

W.W.W./-

THE SURAT ELECTRICITY COMPANY, LIMITED.

KILLICK IND STRIES LTD.

CENTRAL ADMINISTRATION DEPT.
Electricity House,
Santa Cruz (East),
P.B. No. 6802,
BOMBAY. 25.

REference No. SEC/25/925. 30th September 1949.

The Under Secretary to the Govt. Of Bombay,
Public Works Department,
Bombay Castle,
BOMBAY.

Dear Sir,

Ordinance to amended the Bombay Electricity (Emeggency Powers) Act, 1946 - (Ordinance No.V.of 1949.).

With reference to the above Ordinance, we would draw your attenation to the letter addressed by the Secretary, the Association of Electrical Undertakings, Bombay Province, to the Secretary to the Govt. of Bombay P.W.D., Ref. No. AEU/6/474/50 dated 24th September, 49 We would refer in particular to the penultimate paragraph requesting that no orders be issued by Government under Clause 6A, which could result in Licensees being dragged into litigation with any of their consumers, or which could involve Licensees in so severe a penalty as dispossession of their property arising from actions of consumers beyond the Licensees knowledge or control.

Yours faithfully,
The Surat Electricity Company .
CENTRAL ADMINISTRATION DEPARTMENT .

W.W.W./-

3902/36/64815

El. Br. (II) P.W.D.

Submitted together with S. Nos. 64814 & 13

2. As the said question has been taken up separately by the Association of The Electri-cal Undertakings, Bombay Province, and a conference was con-veued only yesterday, the result thereof and likely decision that might have taken on the said question may be awaited, if appd.

Id/- 23-11-49. Id/- 25-11-49.

W.W.W./-

2945.

INDIAN POSTS AND TELEGRAPHS DEPARTMENT.

TELEGRAM.

X OE NEW DELHI V 10 STE 34 BOMWORKS BOMBAY

EL/ II / 33(45) REFER LETTER NO QUE /6/474/50

TWENTYFOURTH SEPTEMBER FROM ASSOCIATION ELECTRICITY UNDE-

ERTAKINGS REGARDING ELECTRICITY CONTROL STOP

KINDLY INTIMATE ACTION TAKIN THEREON = WOMIPO.

W.W.W./-

N O T E

THE ASSOCIATION OF ELECTRICAL UNDERTAKINGS, BOMBAY PROVINCE.

A deputation from the Association waited upon the Hon'ble Dr. Hiraj M. Mehta, Minister for Public Works, Government of Bombay, on Thursday the 11th October, at 12-30 p.m. in Poona, at the office of the Minister.

The Minister was attended upon by Mr J. R. Dhurandhar Additional Secretary, Legal department, Government of Bombay, and the delegation from the Association comprised

Mr. V. F. Noel Paton
" P.E. Patel
" K. G. Milne
" J.B. Manockji
" N.C. Javeri and
" R.P. Aiyer.

In presenting the brief aide-memorie, marked 'A' to the Minister, Mr. Noel Paton on behalf of the delega tion at the outset assured him that they were most eager to co-operation with Government in any co-ordinated control measure they wished to impoement. The delegation, however, expressed their disappointment at the lack of consultation with the Industry at the erlir stages, although as early as 1941 the Association had been recognised by the Government as the spokesman of the Electric Supply Industry in the Province.

The Minister's attention wa also drawn to the difficulties experienced by the Association in obtaining in good time both the Bombay Electricity (Emergency Powers) (Amendment) Ordinance and the Bombay Electricity (Special Powers) (Amendment) Bill, and while the Minister was sorry that this had happened, e was inclined to the view that the Association Secretariat in Bombay.

To avoid a repetition in future of such delays, the delegation suggested that periodical meetings, say, once a month, be held at the Secretariat level between the officers of the P.W.D. and the Secretariat level between the officers of the P.W.D. and the Secretaria of the Federation. The Minister was doubtful whether there was likely to be enough business for such meetings, and he thought that it would be sufficient if the Association's Secretary called upon the Secretariat whenever there was pending matters not disposed of by Government. The delegation, however, though that periodic discussions suggested by them would be very useful and the Minister said he would consider the matter.

Discussion then lead on to the Bombay Electricity (Special Powers) (Amendment) Bill, 1949, and the Minister said that as he was due to attend the Assembly at 2.00 p.m. (when the Bill was scheduled to ~~attend the Assembly at~~ be further discussed), the delegation might concentrate on the funamental objections to the Bill.

At this stage the delegation presented to the Minister a further side memotre, (marked "B" copy attached) and pointed stringent and struck at the confidence of investors. This, at a time when the investment market was already nervous, was unwise capacity to raise development Capital.

The Minister thought that these fears were unfounded, and no responsible Government would be so foolish as to use the provisions in question. He thought these would only be used in case of extreme provocation, and investors (and he was one Himself) had little reason to fear.

The delegation, on the other hand, thought the power of revocation of Licnse was beyond reason, and this was all the more so if for lapses on the part of consumers the Licensee had to suffer.

Dealing with specific objections in the Bill, the delegation, while thanking the Minister for agreeing to the extension of the period within which Lecensees are obliged to submit applications to Government from 15 days to one month, stated that even this period was insufficient & if the signature of the consumer was required upon the special application form as was now the practice. The Minister in his reply stated that th words "such longer period as the Provincial Government may allow" made the Clasue flexible, and in any cas this was an administrative matter to be dealt with by the Executive Authority. The delegatio.. agreed that though this was so, they would be satisfied if Government would adequately modify the application of the Clause by excutive orfer having regard to the difficulty memtioned by them pointing out that the requsition form has invariably been already signed by the consumer.

The Minister stated that if the Association would write a letter explaining the changes necessary, Government would look into the question.

The next point discussed was the new Clause 6A which did not bind the consumer for any violation of Government's orders by using energy for a different purpose than for the one sanctioned b y Government. Government in their letter of 6th October to the Association had stated that Sections 44(b) and 46 of the Indian Electricity Act, 1910 provided punishment for the consumer for misuse of energy, but the delegat on though that this had no relevance in in context of the present Bill. They said that the section should be made more clear by pinning down respons-

responsibility o . the consumer for any malfeasance on his part, and the worry of the Industry w o that Licensees should not be liable for a y misuse of energy by consumers.

The Minister stated that in equity nobody would find fault with a Licensee if it was the consumer who was at fault, and the Section was intended to safeguard against the misbehaviour of both Licensees and consumers.

If this was so, the delegation thought the Section should be redrafte to make it quite clear thatit was intended to apply " for distribution, supply or use of electrical energy by a Licensee or consumer.

The Minister said that he would look into this. (it appeared to the delegation that this amendment could be accepted by Government).

The next point for discussion was the new Clause 6B(a) empowering Government to revoke a License for con travention of any ~~consumer-end~~ order. The delegation was emphatic that this penalty was out ofall measure and, as stated earlier, its effect on the investment market should not be overlooked. Clause 8 of the Bombay Electricity (Emergency Powers) act, 1946, which still was inforce, already provided penalty of fine or imprisonment or both and was it necessary to have any additional penalty? They could understand if the executives of a Co pany were subject ed to any additional penalties, but to visit such a heav penalty as revocation of License on the shareholders of a Company for any malpractices of the Management was drastic.

The Minister though that the fears entertained by the Industry were baseless as any aggrieved Licensee could have recourse to law and should it so happen that an order

revecation had been issued by Government without very proper reasons, he was sure the Lords of the Court would censure such Government, and consequently no Government would use the powers lightly. Government only wanted powers to meet any extreme case.

The delegation stated that if the Government had made up their minds, it was dangerous from the Industry's point of view., Once the power was there, there was always the temptation to use it in ordinately, and as an example was cited the case of a Company's application for import of plant being held up by one Government Department by the use of powers under the Inport Control. Repetition of such instances were not unlikely. Anyway, the delegation did not see why such a stringent penalty as revocation of Licens was necessary. Licensees had carried out governmtnt's orders fully, nay, they had even treated" requests" as orders and implemented them. The delegation therefore, was emphatic that the revocation was unnecessary, and that Clause 8 of the Act providing for normal penalties was sufficient.

The Minister, however, saw no hope of the pena provisions being modified, considering the circustances under with the Clause had been drafted. Government would not, therefore, be inclined to consider altering the revocation Coause although they would favourably consider altering the revocation clause although they would favorably consider making the obligation on the consumer more definite.

The delegation,while appreciating the frankness of the Minister, could not help re-iterating their view, which was that the penalty of revocation

of Licenses was a dangerous threat to the capacity of the Industry to raise further Capital for development. They mentioned to the Minister that in view of the gravity and urgency of the situation, the matter had already been represented to the Central Government and the Minister was asked whether he would have any objection if the Centre was again approached should it so happen that the Bombay Government did not tone down the Clause.

The Minister stated that he would not mind the Industry's approach to the Centre. The Bombay Government had drafted the Clause to take care of certain eventualities, and if the Centre over-ruled them, they would, of course, submit, but then the Centre would have to take the blame should anything go wrong.

At this stage the Minister was asked whether Government would be pleased to let the delegation know the reasons which had actuated Government to put in this Clause, to which his reply was "Not possible".

Another point raised by the delegation in connection with the Bill was the time limit provided in the new Clause 6C for payment of Government Inspector's fees. The delegation felt that it would be more appropriate if instead of the fees being payable "within 10 days from the date of such inspection" they should be made payable " within 10 days from the date of presentation of the Bill for such inspection." The Minister said that he would consider this proposal which sounded reasonable.

Although the Minister was in a hurry, with his consent, there further points were raised. These are covered by the supplementary aide.memoire attached (marked 'C').

1. Surcharge: With the Bombay Electricity (Surcharge) Act, 1946, lapsing on 30th September, 1948, certain Electric Supply Undertakings in the Province had, in terms of the Electricity, (Supply) Act, 1948, adjusted their rates to the extent necessary to offset the surcharges (until recently levied), and rising costs. These increases had carted adverse public opinion in some District towns, and the Minister was requested to consider issuing a suitable Press note explaining why it had been necessary for Licensees to raise tariffs.

The Minister said that such a Press Note at this stage could not be considered by Government, but if there was a request from a Licensee or Licensees, Government would immediately constitute a Rating Committee under the Electricity (Supply) Act, and it would then be time for Governmentto issue a suitabee Press Note. He stated that Government were about to announce the formation of a Rating Committee some time ago, but on a Licensee (The Matheran Electric Supply Co, Ltd.) notifying Government that it had powers to adjust its rates without reference to Government, they had to reconsider the position in law. However, he could at a moment's notice, announce the personnel of the Ratin Committe if there was request. The Minister appreciated that the Licensees were entitled to the continuance of the surcharge, and the public should not grumble if the rates were up to that extent. He, therefore, felt that the Licensees would not be in the wrong if they increased the rates to the extent of the surcharges r

increased the rates to the extent of the surcharges now levied, and this would allow time for the Rating Committee to conclude their enquiries without detriment to the Licensees.

The delegation said they would consider the Minister's proposal and communicate it to Members.

2. Depreciation & 3. Provincial Electricity Board:

The Minister's attention was drawn to requests made by certain Licensees for departure from the prescribed period of lives in respect of certain plant as permissible under the Proviso to Clause XVIII(6) of the Sixth Schedule to the Electricity (Supply) Act, and requested for early action, as otherwise Licensees would have to increase tariffs still further.

The Minister said that there again if there was a Rating Committee, Government could have turned to them for expert advice. He would, therefore, prefer to wait until the Rating Committee is formed.

The delegation drew the Minister's attention to the fact that a Rating Committee was an ad hoc body, not concerned with questions like depreciation. Giving technical advice on such and other allied matters was primarily the responsibility of the Provincial Electricity Board, visualised under the Act.

The Minister stated that he was mentioning the Rating Committee in this connection because it would take some time more interim advice could be sought from the Rating committee.

The Meeting lasted about 1 hour and 15 minutes and discussion was friendly and frank.

BOMBAY, 17th October, 1949.

AIDE MEMOIRE

THE ASSOCIATION OF ELECTRICAL UNDERTAKINGS?

BOMBAY PROVINCE.

Interview with Hon'ble Dr. Jivraj Mehta,
Minister of Public Works,
Government of Bombay,

On the Thursday , the 11th October, 1949.

.....

1. Disappointment at failure of Government to consult Association in important matters or even keep them informed of developments.

2. May Departments concerned please be instructed to ensure that the Association gets advance copies of Gazette notifications as affecting the Industry.

3. Bombay Electricity (Emergency Powers) (Amendment) Ordinance and Bill.

Association's letter of 24th September and Government's reply.

Penal provisions of Sections 6A and 6B strike at Investors.

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Bombay 11th October, 1949.

W:W.W./_

AIDE - MEMOIRE.

THE ASSOCIATION OF ELECTRICAL UNDERTAKINGS,

BOMBAY PROVINCE.

. . . . . .

Association grateful to the Hon'ble Minister for affording an opportunity to place before him personally the Industry's views on the Bombay Electricity (Special Powers) (Amendment) Bill, 1949.

The Association's telegrams dated 5th and 6th October to the Hon'ble Minister were the result of information from from the Secretariat in Bombay that its representation on the Bombay Electricity (Emergency Powers) (Amendment) Ordinance, 1949, had remained unattended to.

While the Association is thankful to Government for their letter of 8th October indicating the action taken by them to meet the Industry's views, the association is of the opinion that this does not meet the situation adequately.

The penalties against a Licensee provided under the new Clause 6 B are drastic and should have not place in legislation of this type. Other [illegible] penalties are already there under Clause 8. [illegible] a License the will have a deterrent effect on already nervous money market and increase the difficulties to raise development capital.

The penalties under Sections 44 and 46 of the Indian Electricity Act, 1910 (mentioned in Government's letter of 8th October 1949) appear inapplicable, and, in any case, are relatively small. Here again see the penalties under Clause 8, but note that in any event the consumer is not bound by clause 6(A) (1)(a).

In Clause 6(e) surely no penalty should properly accrue till after a proper bill has been submitted and not been paid.

On further consideration the follow in poin s arise.

Clause 5(2) While the Association is pleased to note that the period of 15 days within which licensees are obliged to submit applications to Government for purchase of machinery, etc., and if it is proposed to be extended to one month, could state that even this period will be inadequate if the signature of the consumer is insisted upon on the special application from as is now the practice. The consumer has to sign his requisition on the licensee originally and need not therefore sign the special form to be submitted by the Licensee to Government. He may delay unduly, or misley the papers. It is, therefore, necessary that consumers signature on the special form be not required in administering this Clause.

Clause 5A(1) empowers Government to cancel sanctions for loads already granted. This would result in hardship as on the basis of such sanction heavy investment expenditure is undertaken by consumers in purchase of machinery, etc., and if their loads once sanctioned are likely to be suspended

suspended (as has once been done by Government, vide their lette. to Licensee s No. 1932/36E1(c) of 20th June, 1949) they will be put to great loss.

The associat on would, the refore, urge that the s gg-esttions contained in its letter of 24th September, and the points mentioned above, be favourably considered and the Bill suitably amended in the Upper House if it has passed all the stages in the Lower House.

Association would also like to take this opportunity to stress that it be consulted in such matters (it has already been recognised the Public Works Department No. S37/6/4359.M of 9th April 1941) as that would enable government to know the Industry's point of view in good time.
May we also suggest that to avoid such developments in future as has happened in the case of this Bill, suitable consultative machinary be evolved. We suggest that the Secretary of the P.W.D. and other Officers of Government meet the Secretariat of the Association at periodical intervals, say once a month, to discuss out standing questions. This would be of great assistance in the disposal of such issues as they arise from time to time.

. . . . . .

Bombay, 11th October, 1949,

W.W.W./-

Supplementary Aide-Memoir.

1. The Bombay (War Costs) Surcharge act, 1946, expired on 30th September, and in spite of the Association's request on action was taken by Government to reenact the provisions of the Act. The Association was not even notified in writing Government's decision on the matter although verbally it was given to understand that it was Government's intention to let the Act expire. Consequently Licensees had to resort to their rights under the Electricity (Supply) Act, 1948, and increase the rates to the extend necessary to offset the Surcharge and rising costs. Reactions against these rate increases in mofussil towns have been adverse and would Government be very kind as to issue a Press Note explaining that the increase in rates effected by Licensees have been found necessary to offset the Surcharge up till now in force and in accor-dance with the Electricity(Supply) Act, 1948, which ensures Licensees a reasonable return. Such an announcement by Government would have a stabilising effect.

2. Certain Licensees h ave sent representations to Government requesting sanction for departure from the prescribed period of lives in respect of certain plant as permissible under the Proviso to Clause CVII (8) of the Sixth Schedule to the electricity (Supply) Act, 1948. Early action on these would be greatly appreciated, as otherwise further increase in triffs wi l result this raising

living costs.

3. Information on the progress of the formation of the Provincial Electricity (Supply) Act would be much appreciated.

11th October, 1949.

The Association of Electrical Undertakings,
Bombay Province.

W.W.W./-

~~55~~ 69

The Association of Electrical Undertakings
Bombay Province.
.....

Killick Building
Home Street.
Bombay, 18th October 1949.

Ref. No. AEU/6/539/50

The Secretary to the Government of Bombay,
Public Works Department,
Council Hall,
POONA.

DEar Sir,

I enclose a copy of Note covering the discussion a delegation from the Association had with the Hon'ble Dr. Jivraj Mehta at Poona on 11th October, 1949. Certain points in the Note requiring further attention are being dealt with in the separate correspondence.

Yours faithfully,

Id/-
Secretary

Encl:-

W.W.W./-